

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHN G. PEDICINI,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	Case No. 04-12395-JLT
UNITED STATES OF AMERICA,	:	
ANN M. VENEMAN, SECRETARY,	:	
UNITED STATES DEPARTMENT OF	:	
AGRICULTURE, AND LINDA	:	
SPRINGER, DIRECTOR, UNITED	:	
STATES OFFICE OF PERSONNEL	:	
MANAGEMENT,	:	
	:	
Defendants.	:	

**MOTION FOR EXTENSION OF DEADLINES ON**  
**DISPOSITIVE MOTIONS (ASSENTED TO)**

The United States respectfully moves the Court to extend the deadlines established by the Court's February 8, 2006 order for a period of fourteen (14) days. Good cause exists for granting the United States's request. Indeed, during the scheduling conference in the above-captioned matter on February 7, 2006, when the Court set the deadline for the government's motion for summary judgment as February 9, 2006, the undersigned counsel did not realize that he had a trial scheduled to begin on February 10, 2006, in another matter. While the undersigned counsel has been working diligently to meet the Court's deadline, due to the amount of preparation needed for his trial, the undersigned counsel needs a brief extension of time in order to complete the government's motion for summary judgment. Plaintiff assents to this Motion.

Therefore, the United States requests that the Court extend the deadline for (1) the government's motion for summary judgment, which is currently March 9, 2006, to March 23, 2006; (2) the plaintiff's opposition and cross-motion for summary judgment, which is currently March 29, 2006, to April 12, 2006; and (3) the government's opposition to plaintiff's cross-motion for summary judgment, which is April 18, 2006, to May 2, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Damian W. Wilmot  
DAMIAN W. WILMOT  
Assistant U.S. Attorney  
Moakley Federal Courthouse  
One Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100

Dated: March 6, 2006

**CERTIFICATION UNDER L.R. 7.1**

I certify that in accordance with Local Rule 7.1, on March 6, 2006, I conferred with Plaintiff and he assents to this Motion.

/s/ Damian W. Wilmot  
DAMIAN W. WILMOT  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

Suffolk, ss.

Boston, Massachusetts  
March 6, 2006

I certify that on March 6, 2006, I caused a copy of the foregoing Motion to be served on Plaintiff, John G. Pedicini, 10 Milano Drive, Saugus, MA 01960, by first class mail, postage pre-paid.

/s/ Damian W. Wilmot  
DAMIAN W. WILMOT  
Assistant U.S. Attorney